

7

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

v.

D-1 LOUIS DANIEL ZAMORA,

Defendant.

Case: 2:24-cr-20640

Assigned To : Lawson, David M.

Referral Judge: Altman, Kimberly G.

Assign. Date : 11/19/2024

Description: INDI USA v SEALED
MATTER (JP)

Violations:

18 U.S.C. § 1956(h)

18 U.S.C. § 1956(a)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(21 U.S.C. §§ 1956(a), 1956(h)- Conspiracy to
Launder Monetary Instruments)

From on or about November 15, 2019, through on or about November 21, 2019, in the Eastern District of Michigan and elsewhere, the defendant, LUIS DANIEL ZAMORA, did knowingly, intentionally, and unlawfully combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses in violation of Title 18, United States Code, Section 1956, namely:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute controlled substances, with the intent to promote the carrying on of specified unlawful activity, that is, conspiracy to distribute controlled substances; knowing, while conducting and attempting to conduct such financial transactions, that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

(b) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute controlled substances, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity; knowing, while conducting and attempting to conduct such financial transactions, that the property involved in the financial transactions represented the

proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

All in violation of Title 18, United States Code, Section 1956(h).

COUNT TWO

(21 U.S.C. § 1956(a) - Laundering Monetary Instruments)

On or about November 21, 2019, in the Eastern District of Michigan, the defendant, LUIS DANIEL ZAMORA, did

(a) knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute controlled substances, with the intent to promote the carrying on of specified unlawful activity, that is, conspiracy to distribute controlled substances; knowing, while conducting and attempting to conduct such financial transaction, that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and

(b) knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which

transaction involved the proceeds of specified unlawful activity, that is, conspiracy to distribute controlled substances, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity; knowing, while conducting and attempting to conduct such financial transaction, that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

all in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and (B)(i).

FORFEITURE ALLEGATIONS
18 U.S.C. § 982(a)(1))

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States

Code, Sections 1956(h) and 1956(a), set forth in Count One and Count Two of this Indictment, the defendant shall forfeit to the United States of America, any property, real or personal, involved in such offense, and any property traceable to such property. Property to be forfeited, includes, but is not limited to:

- \$450,020 in United States currency

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of

substitute property pursuant to Title 21, United States Code,
Section 853(p).

This is a True Bill.

/s/ Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON
United States Attorney

/s/ Benjamin Coats
Benjamin Coats
Chief, Drug Task Force Unit

/s/ David J. Portelli
David J. Portelli
Assistant United States Attorney

Dated: November 19, 2024

Case: 2:24-cr-20640
Assigned To : Lawson, David M.
Referral Judge: Altman, Kimberly G.
Assign. Date : 11/19/2024
Description: INDI USA v SEALED
MATTER (JP)

United States District Court
Eastern District of Michigan

Criminal Case Cover

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>WP</i>

Case Title: USA v. Luis Zamora

County where offense occurred : Wayne

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

November 19, 2024
Date

David Portelli

David Portelli
Assistant United States Attorney
211 W. Fort St., Ste 2001, Detroit, MI 48226
Fax: 313-226-3265
E-Mail address: Dave.Portelli@usdoj.gov
Attorney Bar #: P40688

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.